

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

TROY ETTS and LEA ETTS,

Plaintiff,

Case No. 13-11588

Hon. Mark A. Goldsmith

v.

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, as Trustee for Securitized Asset  
Backed Receivables LLC Trust 2004-NCI,  
Pooling and Servicing Agreement Dated as of  
April 1, 2004; and OCWEN LOAN SERVICING, LLC,

Defendants.

LEVEL ONE LEGAL SERVICES,  
P.C.

Kelli C. Meeks (P40748)  
Attorney for Plaintiffs  
455 E. Eisenhower Parkway  
Suite 240  
Ann Arbor, MI 48108  
(734) 274-4329

HERTZ SCHRAM PC

Deborah S. Lapin (P59027)  
Attorneys for Defendants Deutsche  
Bank and Ocwen Loan Servicing,  
LLC  
1760 S. Telegraph Road, Suite 300  
Bloomfield Hills, MI 48302  
(248) 335-5000

**DEFENDANTS DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE FOR SECURITIZED ASSET BACKED RECEIVABLES LLC  
TRUST 2004-NCI, POOLING AND SERVICING AGREEMENT DATED AS  
OF APRIL 1, 2004 AND OCWEN LOAN SERVICING, LLC'S  
WITNESS LIST**

Defendants Deutsche Bank National Trust Company, as Trustee for  
Securitized Asset Backed Receivables, LLC Trust 2004-NC1, Pooling and  
Servicing Agreement Dated as of April 1, 2004 ("Deutsche Bank") and Ocwen

LAW OFFICES HERTZ SCHRAM PC

Loan Servicing, LLC ("Ocwen") (collectively Deutsche Bank and Ocwen may be referred to as "Defendants"), by and through their attorneys, Hertz Schram PC, submit the following as their Witness List:

1. All members of Plaintiffs' immediate family and any and all persons presently residing or that may have resided at the subject property in the last three (3) years.

2. Any and all representatives, employees, former employees, servants and/or agents and Keeper of the Records for Deutsche Bank, c/o Hertz Schram PC, 1760 S. Telegraph Road, Suite 300, Bloomfield Hills, MI 48302.

3. Any and all representatives, employees, former employees, servants and/or agents and Keeper of the Records for Ocwen, c/o Hertz Schram PC, 1760 S. Telegraph Road, Suite 300, Bloomfield Hills, MI 48302.

4. Representatives, employees, agents and keeper of records of Litton Loan Servicing.

5. Representatives, employees, agents and keepers of records of Monroe County Sheriff's Office.

6. Representatives, employees, agents and keepers of records of Monroe County Register of Deeds.

7. Representatives, employees, agents and keeper of records of Randall S. Miller and Associates.

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8. Representatives, employees, agents and keeper of records of Plaintiffs' employers from 2003 through the present.

9. Representative, employees, agents and keeper of records of Internal Revenue service.

10. Representatives, employees, agents and keeper of records of State of Michigan Treasury.

11. Any and all representatives, employees, former employees, servants and/or agents and Keeper of the Records for New Century Mortgage.

12. Any and all representatives, employees, former employees, servants and/or agents and Keeper of the Records for State of Michigan Office of Financial and Insurance Regulation.

13. Angela Zarka.

14. Any witness identified on Plaintiffs' Initial Disclosures and/or Witness List.

15. Any necessary expert witness.

16. Any necessary rebuttal witness.

17. Any necessary impeachment witness.

18. Any and all representatives, employees, former employees, servants and/or agents and Keeper of the Records for any lenders that currently have or have had mortgage liens recorded against the subject property.

19. Any individuals or entities named in any documents and/or correspondence between Plaintiffs, their attorneys and/or agents, and Deutsche Bank, Ocwen and/or Litton.

20. Any individual and/or entity involved in any refinance efforts on behalf of Plaintiffs regarding the subject property.

21. Any notary public who notarized any closing document, mortgage, deed or any other documents relevant to the subject matter of this case.

22. Any individual who executed any closing document, mortgage, deed or any other documents relevant to the subject matter of this case.

23. Any individual who executed any document that is attached to any pleading in this matter.

24. All persons named in discovery including, without limitation, interrogatories, answers, depositions, answers to requests to admit, identified in answers and documents to requests for production of documents, in any closing or loan origination file, loan modification and/or loss mitigation requests and any person whose deposition will be taken herein.

25. Defendants Deutsche Bank and Ocwen reserve the right to call any and all witnesses whose identity becomes known through discovery, including through trial, as discovery has not been completed.

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26. Defendants Deutsche Bank and Ocwen reserve the right to amend their Witness List as further witnesses become known through the course of discovery or otherwise.

Respectfully submitted,

HERTZ SCHRAM, PC

/s/ Deborah S. Lapin

Deborah S. Lapin (P59027)

Attorneys for Defendants Deutsche Bank and  
Ocwen

1760 S. Telegraph Road, Suite 300

Bloomfield Hills, MI 48302

(248) 335-5000

Dated: August 18, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2015, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

LEVEL ONE LEGAL SERVICES, P.C.

Kelli C. Meeks (P40748)

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455 E. Eisenhower Parkway

Suite 240

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/s/Deborah S. Lapin

Deborah S. Lapin